

2nd TIME  
SENT

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

UNITED STATES OF AMERICA

Plaintiff

v.

Dennis D. Brooks  
Barbara D. Brooks,

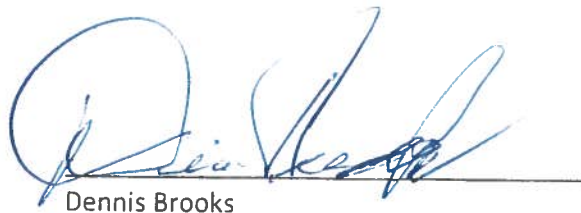
Defendants.

Case No. 6:17-cv-0210-TMC-JDA

DEFENDANTS' ANSWER AND FIRST OBJECTION TO  
MICHAEL W. MAY'S DECLARATION IN SUPPORT  
OF MOTION FOR SUMMARY AND DEFAULT  
JUDGMENT

RECEIVED  
USDC CLERK, GREENVILLE, SC  
2021 MAR 19 PM 4:33

1. Defendants submitted to May copies of mutual fund holdings which are completely adequate and acceptable in this type of situation. These statements were prepared by the mutual fund companies.
2. IRS FORM 1040 were submitted properly for 2000, 2005 and 2006 but original copies of signed returns were not available, therefore, not dated.
3. Defendants will provide affidavit of custodian who held mutual fund and stock documents.
4. Defendants hereby object to Summary Judgment because complete discovery was never completed by plaintiff.
5. Defendants hereby request a Summary Judgment hearing and be notified with at least a 90 day notice.



Dennis Brooks

September 10, 2018